

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: :  
JUANA ORTIZ : CHAPTER 13  
Debtor : CASE NO. 5-22-00155

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**OBJECTION TO CERTIFICATION OF DEFAULT**

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NOW COMES, Juana Ortiz, the above Debtor, by and through her counsel, Tullio DeLuca, Esq., and files this Objection to Certification of Default and states the following:

1. On Jul 25, 2023, a Motion to Dismiss due to material default was filed.
2. On April 15, 2025, Jack N. Zaharopoulos, Esq. filed a Certificate of Default stating that the Debtor has failed to cure the arrears.
3. Debtor's Counsel is in the process of contacting the Debtor to ascertain if the payments have been made and/or if Debtor is in possession of funds needed to cure the arrears.
4. The Debtor requests that a hearing be scheduled on the Objection to the Certificate of Default.

WHEREFORE, the Debtor respectfully requests that this Honorable Court sustain the Objection to the Certification of Default and deny the dismissal of the Chapter 13 Case.

Respectfully submitted,

Date: April 17, 2025

/s/Tullio DeLuca  
Tullio DeLuca, Esquire  
PA ID #59887  
Counsel for Debtor  
381 N. 9<sup>th</sup> Avenue  
Scranton, Pa 18504

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**CERTIFICATE OF SERVICE**

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The undersigned hereby certifies that on April 17, 2025, he caused a true and correct copy of Debtor's Objection to Certification of Default to be served Via electronic filing on the following CM/ECF participants:

Jack N. Zaharopoulos, Esq. at info@pamd13trustee.com

Date of Mailing: April 17, 2025

/s/Tullio DeLuca  
Tullio DeLuca, Esquire